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6 Attorney for Defendant  
7 ANTHONY ALEXANDER BASSO

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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE EASTERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA,	) Case No. 2:22-cr-00248-DJC-1
Plaintiff,	) STIPULATION AND ORDER TO CONTINUE
vs.	) STATUS CONFERENCE AND EXCLUDE
ANTHONY ALEXANDER BASSO,	) TIME
Defendant.	) Date: January 25, 2024
	) Time: 9:00 a.m.
	) Judge: Daniel J. Calabretta
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IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney James Conolly, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Douglas Beevers, attorney for Anthony Alexander Basso, that the status conference, currently scheduled for January 4, 2024, be continued to January 25, 2024 at 9:00 a.m.

Defense counsel requests additional time to review discovery and conduct investigation in this case. The parties are working to resolve the case, but do not have a formal plea ready to present to the Court. The parties believe a continuance to January 25, 2024, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded of this order's date through and including January 25, 2024; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based upon continuity of counsel and defense preparation.

Counsel and the defendant also agree that the ends of justice served by the Court granting this continuance outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

Dated: January 3, 2024

HEATHER E. WILLIAMS  
Federal Defender

*/s/ Douglas Beevers*  
DOUGLAS BEEVERS  
Assistant Federal Defender  
Attorney for Defendant  
ANTHONY ALEXANDER BASSO

Dated: January 3, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ James Conolly  
JAMES CONOLLY  
Assistant U.S. Attorney  
Attorney for Plaintiff

## **ORDER**

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including January 25, 2024, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the January 4, 2024 status conference shall be continued until January 25, 2024, at 9:00 a.m.

Dated: January 3, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE